

United States District Court

for the
Western District of New York

United States of America

v.

Case No. 22-MJ-685

TONY ORLANDO CAMACHO
a/k/a ANTHONY CAMACHO

Defendant

CRIMINAL COMPLAINT

I, Scott M. Kendall, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Beginning on or before January 1, 2021 through and including the present date, in the Western District of New York, the defendant, TONY ORLANDO CAMACHO a/k/a ANTHONY CAMACHO, violated Title 18, United States Code, Sections 2314 and 2315 (Interstate Transportation and Sale of Stolen Goods), offenses further described as follows:

The defendant knowingly sold and transported stolen goods, wares, and merchandise that have crossed a State or United States boundary after being stolen, in violation of Title 18, United States Code, Sections 2314, and 2315.

This Criminal Complaint is based on these facts:

SEE ATTACHED AFFIDAVIT OF HSI SPECIAL AGENT SCOTT M. KENDALL

☒ Continued on the attached sheet.



Complainant's signature

SCOTT M. KENDALL, Special Agent, HSI

Printed name and title

Submitted electronically by email in .pdf format. Oath administered, and contents and signature, attested to me as true and accurate telephonically pursuant to Fed. R. Crim. P. 4.1 and 41(d)(3).

Date: October 05, 2022



Judge's signature

City and State: Rochester, New York

HON. MARK W. PEDERSEN
UNITED STATES MAGISTRATE JUDGE

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

STATE OF NEW YORK)
COUNTY OF MONROE) ss.:
CITY OF ROCHESTER)

I, SCOTT M. KENDALL, being duly sworn, depose and say:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent (SA) with the Department of Homeland Security (DHS), Homeland Security Investigations (HSI), and have been so employed since March 2021. I am currently assigned to the HSI Buffalo Border Enforcement Security Task Force (BEST). My responsibilities include investigating violations of federal criminal laws, including crimes involving smuggling, narcotics trafficking, and money laundering. As such, I am an “investigative or law enforcement officer” within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516, and Title 21 of the United States Code.

2. As part of my employment as an HSI Special Agent, I have participated in the execution of search and arrest warrants, conducted surveillance, reviewed financial records, served subpoenas and carried out other investigative duties. I received a Bachelor’s degree in Finance from the Canisius College of Buffalo, where I took numerous classes in finance and accounting. I was previously employed as an accounting assistant as well as a loan processor at a financial institution. I received training in financial investigations and constitutional law through approximately twenty-seven weeks of training in the Criminal Investigator Training

Program and HSI Special Agent Training academy at the Federal Law Enforcement Training Center in Glynco, Georgia. Through my training and experience, I have become familiar with the ways in which money is illegally or fraudulently obtained and laundered to avoid detection by law enforcement.

3. This affidavit is being submitted for the purpose of establishing probable cause to believe that Tony Orlando Camacho a/k/a Anthony Camacho (“CAMACHO”) has sold and transported stolen goods, wares, and merchandise that have crossed a State or United States boundary after being stolen, in violation of Title 18, United States Code, Sections 2314 and 2315 (hereinafter, collectively the “TARGET OFFENSES”).

4. The information and statements contained in this affidavit are based upon my personal knowledge and observations, my training and experience, conversations with other law enforcement officers, and my review of records, witness statements, and information supplied by other law enforcement officers and regulatory agencies.

5. Because this affidavit is being submitted for the limited purpose of establishing probable cause to secure a criminal complaint, I have not included every detail of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause to believe that Tony Orlando CAMACHO (hereinafter “CAMACHO”) has committed the TARGET OFFENSES.

6. Unless specifically indicated, all conversations and statements described in this affidavit are related in substance and in part.

BACKGROUND OF INVESTIGATION

7. In or around November 2021, there were multiple burglaries across multiple counties in New York during which masked individuals smashed store windows with a hammer, entered, and stole new-in-box tools and equipment.

8. Further investigation revealed that, shortly after each burglary, the eBay account Ton.Camac advertised similar new-in-box tools and equipment for sale.

9. According to eBay's records, the account Ton.Camac belongs to Tony CAMACHO and has a registered address of 641 Hawks Nest Circle in Greece, New York.

10. For example, on or about November 14, 2021, a Honda Generator eu1000 was stolen from an equipment store located in Gates, New York. Surveillance video from the store showed a male break the front glass door during non-business hours, enter the building, steal a Honda Generator and two Husqvarna chainsaws, and leave the location.

11. According to eBay's records, on or about November 14, 2021, the eBay account Ton.Camac listed a "Honda EU1000i 1000W 120V Portable Home Gas Power Generator with CO-Minder" for sale. The Honda Generator eu1000 was sold to a buyer in Alaska the same day.

12. On or about November 16, 2021, law enforcement officers spoke with CAMACHO regarding the Honda Generator eu1000. CAMACHO admitted that he sold the generator through his eBay account, Ton.Camac. CAMACHO further stated that he purchased the generator from an individual named "Billy." CAMACHO said he buys a lot

of items from “Billy.” CAMACHO was shown surveillance video of the equipment store burglary and identified the suspect as “Billy.”

13. On or about December 2, 2021, at approximately 8:22 PM, a larceny occurred at a Target in Greece, New York. Two Vitamix blenders, each with a retail value of \$289.95, were stolen. The morning after the larceny occurred, two “Vitamix E310 Explorian Series Blender VM0197 Black, NEW & SEALED!” were posted for sale on the Ton.Camac eBay page for \$289 each (just under retail value). The suspect in the larceny has not been identified at this point in time.

14. On or about December 20, 2021, two unknown males entered Harbor Freight and Tool located at 1601 Penfield Road and stole three welders with a total retail value of \$2,949.97. The next day, two welders were posted for sale on the Ton.Camac eBay account page. The first was a “New Vulcan OmniPro 220 57812 Industrial Multiprocess Welder w/120/240 Volt Input” for \$780.00. The second was a “Vulcan ProTIG 165 Welder with 120/240 Volt Input (VW165-PT)” for \$528.00. The suspects in the larceny have not been identified at this point in time.

15. On or about December 21, 2021, a larceny occurred at a Harbor Freight in Irondequoit, New York. Two unknown suspects entered the store and stole a “Titanium Stick 225” welder and a “Titanium Tig Welder 200.” The items were valued at \$499.99 and \$999.99, respectively. The store’s surveillance video footage of the larceny shows two males entering the store then leaving with the products almost immediately. In the video, you can clearly see a sticker on the top of the box of one of the welders and clearly see that the item is a box with the label “Titanium Stick 225.” The sticker is on the box in a diagonal position.

16. On or about December 21, 2021 a “Titanium Tig Welder 200” was posted for sale on the Ton.Camac eBay page. The item was listed for \$589.00 (under retail value). The next day, on or about December 22, 2021, a “Titanium Stick 225 Inverter Stick Welder TI-STK225 Electrode Holder”. The posting for the “Titanium Stick 225” welder included a picture of the item and, in that picture, the diagonal bar code sticker that was on the welder when it was stolen from Harbor Freight is visible. The welder was listed for sale at the price of \$270.00 (below retail value). According to eBay’s records, the Titanium Stick 225 welder was sold on December 23, 2021, to a buyer in Georgia. After receiving the item in Georgia, the buyer shipped the item to law enforcement authorities in Rochester, New York, who confirmed it was the item stolen in the aforementioned larceny. The suspects in the larceny have not been identified at this time.

17. On or about January 12, 2022, a larceny occurred at Harbor Freight and Tool in Henrietta, New York. Two unknown individuals entered the store and stole a generator described as a “3500 generator model #56720” valued at \$869.99. On or about January 13, 2022, the eBay account Ton.Camac posted a “PREDATOR 3500 Watt Inverter Power Generator SEALED!!!! FAST SHIPPING!!!” for sale for \$1,090.00. The posting included pictures of the item in which a portion of the model number can be seen. Though part of the number is obstructed by a packaging strap, the numbers “567**” are visible. Additionally, one of the pictures shows a packaging sticker with a barcode and the numbers “0233” on it. A Harbor Freight National Investigator informed me that the Henrietta location is designated store number “233.” The suspects in this larceny have not been identified at this time.

BOOSTER 1

18. In or around December 2021, a specific individual (hereinafter “Booster 1”) committed several larcenies at Target Stores throughout Monroe County. Beginning on or about December 14, 2021, through and including on or about May 25, 2022, Booster 1 committed approximately 30 known larcenies at Target locations and stole approximately \$18,601.45 worth of merchandise.

19. On approximately 12 of those occasions, items matching the description of what was stolen (with an aggregate value of \$10,246.33) were posted for sale by Ton.Camac shortly after the larcenies occurred.

20. For example, on or about February 1, 2022, at approximately 8:03 PM, employees at the Target store located in Henrietta, New York, observed an individual matching Booster 1’s description select several packages of Nicorette gum as well as other items, exit the store without paying, and load the stolen merchandise into a silver Chevrolet Equinox. Target subsequently confirmed that fifteen packages of Nicorette, a tote, a garbage can, and an Anova Sous slow cooker all worth \$1,042.84 were stolen during the incident. The stolen flavors of Nicorette gum were Fruit Chill, Cinnamon, and White Ice.

21. Later that night, the same silver Chevrolet Equinox was observed pulling into the parking lot of another Target in Greece, New York. The same male subject was seen entering the store where he quickly selected a knife set, Ninja Coffee maker, and two KitchenAid Hand Mixers, which totaled \$569.96 worth of product. The subject male exited the store, passing all points of sale without paying for the items, and loaded the items into the silver Chevrolet Equinox with the assistance of an unidentified person.

22. Around the same time, covert surveillance was being conducted at CAMACHO's residence, 641 Hawks Nest Circle. Surveillance observed CAMACHO exit his residence empty handed and enter the driver's side of a Dodge Challenger. CAMACHO drove to 1100 Long Pond Road, where he parked next to the silver Chevrolet Equinox. CAMACHO exited his vehicle to meet with the male suspect and another unknown male. The three were seen interacting for a few seconds at the back of the silver Equinox and then carrying several boxes from the suspects' Equinox to CAMACHO's vehicle. Following the transfer of items into CAMACHO's vehicle, the parties had another brief exchange and then returned to their respective vehicles. CAMACHO exited the parking lot and drove directly back to 641 Hawks Nest Circle. CAMACHO got out of his vehicle and took the aforementioned items from the vehicle and into 641 Hawks Nest Circle. This incident was captured on video.

23. Surveillance followed the Equinox into the City of Rochester where it was observed going to a known drug location.

24. On or about February 2, 2022, a "Ninja Hot & Iced Coffee Maker - CM305 NEW" (one of the items that was stolen from Target in Greece, New York) was posted for sale on the Ton.Camac eBay page. The item was listed for sale for \$99.00 (under retail value). According to eBay's records, the Ninja Coffee maker was ultimately sold to a buyer in New Jersey.

25. Furthermore, on or about February 2, 2022, the Ton.Camac account posted several lots of Nicorette gum for sale. The posted flavors were Fruit Chill, White Ice, and Cinnamon.

26. On or about February 2, 2022, at approximately 8:29 PM, employees at the Target store located in Penfield, New York, observed an individual matching Booster 1's description select several packages of Nicorette gum as well as other items, exit the store without paying, and load the stolen merchandise into a silver Chevrolet Equinox. Target subsequently confirmed that fourteen packages of Nicorette, worth \$867.86 were stolen during the incident. The stolen flavors were Fruit Chill, Cinnamon, Spearmint, and White Ice.

27. On or about February 4, 2022, the Ton.Camac account posted several lots of Nicorette gum for sale. The posted flavors were Fruit Chill, Cinnamon, Spearmint, and White Ice.

28. On or about March 10, 2022, the Ton.Camac eBay page started posting beauty products, such as perfume, for sale.

29. Around the same time, several larcenies had occurred at Ulta Beauty stores across New York State. The stolen items were primarily perfume. The main suspect in these thefts matched Booster 1's description.

30. On or about March 16, 2022, Investigators were notified of a larceny at the Ulta Beauty in Victor, New York. A male who matched Booster 1's description took items from the store, walked out without paying, and got into a vehicle occupied by three other individuals. Ontario County deputies stopped the vehicle and took the occupants into custody. The individuals were identified as JK ("Booster 1"), JB, AC and CH.

31. Once Booster 1 was identified, law enforcement was able to determine that he has an extensive theft arrest record across New York State and a documented substance abuse issue. In 2019, Booster 1 overdosed on heroin and needed to be revived using Narcan.

32. Booster 1 waived *Miranda* and admitted to stealing the items (worth \$1,469.00) from Ulta that day. All four individuals were then issued appearance tickets and released.

BOOSTER 2

33. Booster 2 has been arrested over ten times for theft-related incidents at retail locations throughout New York State, including but not limited to Lowes and Home Depot.

34. In or around July of 2021, the Town of Greece Police Department conducted an investigation into a theft that occurred at the Home Depot in Greece, New York. Investigators were able to determine that Booster 2 was the suspect in the case and interviewed Booster 2 regarding the theft.

35. Booster 2 admitted to stealing the items in the aforementioned larceny and selling the product he steals to a man named “Tony.” Booster 2 said that he meets “Tony” at 1100 Long Pond Road almost daily to sell him stolen wire. Booster 2 also stated that he sells “Tony” stolen clothing and power tools. Booster 2 said he called “Tony” using the number XXX-XXX-4120 when he has stolen property to sell. Booster 2 stated that “Tony” sells the stolen items on eBay.

36. Booster 2 was arrested and eventually secured in Monroe County Jail.

37. According to eBay’s records, XXX-XXX-4120 is also the number associated with the account Ton.Camac.

BOOSTER 3

38. On or about December 1, 2021, a New York State Department of Environmental Conservation Police Officer attempted to stop a dark colored Honda Civic. The vehicle did not stop; it fled and ultimately crashed. Two of the vehicle's occupants fled, and a third occupant was taken into custody at the scene of the crash. The two who fled were taken into custody a short time later. The occupants of the vehicle were identified as Booster 3, ZH, and JS.

39. Further investigation showed that the vehicle had switched plates and had been stolen out of Rochester, New York.

40. The driver of the vehicle appeared to be under the influence of narcotics. During an inventory search of the stolen vehicle, crack-cocaine, suspected fentanyl, and glass smoking pipes were found.

41. Booster 3 was arrested for Criminal Possession of Stolen property and held without bail on an outstanding bench warrant.

42. On or about December 27, 2021, Booster 3 waived *Miranda* and spoke with investigators from the Monroe County Sheriff's Office and Gates Police Department. Booster 3 stated in the interview that he was familiar with CAMACHO and identified him in a confirmatory ID procedure. Booster 3 stated that he sold stolen items to CAMACHO and that CAMACHO knew that the items were stolen. Booster 3 said he would meet CAMACHO in the parking lot at the corner of Maiden Lane and Long Pond Road to sell him stolen goods.

43. 1100 Long Pond Road is located at the corner of Maiden Lane and Long Pond Road.

BOOSTERS 4, 5, and 6

44. On or about May 25, 2022, at approximately 7:40 AM, property—including two EGO leaf blowers and an EGO multi-head edger kit—was stolen from a Lowe’s in Greece, New York. The store’s surveillance video shows a male matching Booster 5’s description stealing multiple items from the store and then place the items into the back of a black Chevy pickup bearing NYS license plate AFY3012. The value of property taken aggregated to \$723.55.

45. Later that day, at about 2:39 PM, two males matching the physical descriptions of Booster 4 and Booster 5 stole additional merchandise from a Lowe’s located in Macedon, New York. According to Lowe’s asset protection, the stolen products were worth an aggregate of \$1,938.92. Surveillance footage showed the two males fleeing the store in a black Chevrolet Silverado pick-up with NYS registration JGF4149. A search of the NYS DMV database revealed that the pick-up truck was registered to “RJ” (hereinafter “Booster 4”) and that its registration was suspended for insurance lapse.

46. That day, a physical surveillance detail was being conducted at CAMACHO’s residence, 641 Hawks Nest Circle. At approximately 3:20 PM, CAMACHO, drove a Toyota Tundra to 1942 West Ridge Road.

47. 1942 West Ridge Road is a small strip-mall with a large – mostly empty – parking lot. After arriving at the lot, CAMACHO parked next to a 1999 Chevrolet Silverado pick-up truck bearing NYS registration JGF4149 (*i.e.*, Booster 4's vehicle).

48. At about 3:42 PM, CAMACHO met with two people. During the meeting, several new-in-box items were taken out of the bed of the Chevrolet pick-up and placed in the bed of CAMACHO's Toyota truck. Four of the items appeared to be a lawn mower, two edger tools, and a leaf blower. These items were in black boxes with bright green accents. Another item was a Husqvarna backpack blower in a large blue box. At about 3:48 PM, CAMACHO paid the two males, and all parties got into their respective vehicles and left the location.

49. Investigators were able to follow the Chevrolet pick-up truck from the meet-up location. The subject vehicle eventually stopped at 1962 Lyell Avenue. Because of the pick-up truck's suspended registration status, at about 3:59 PM, a deputy initiated a traffic stop of the Chevrolet pick-up truck in the parking lot of 1962 Lyell Ave.

50. During this stop, the deputy identified the driver of the vehicle as Booster 4, the front passenger as "CC" (hereinafter "Booster 5") and the rear passenger as "TR" (hereinafter "Booster 6").

51. Booster 4 had two active warrants, Booster 5 had five active warrants, and Booster 6 had one active warrant. All three individuals were detained and turned over to the respective law enforcement agencies to complete the warrant service process on them. Boosters 4, 5, and 6 all have documented substance abuse issues.

52. Booster 4's Chevrolet pick-up truck was subsequently towed from the scene. An inventory search was conducted of the truck. Items consistent with the collection and sale of scrap metal were found in the truck bed. A prescription pill bottle containing what appeared to be several tablets of Methylphenidate Hydrochloride was found in the truck cabin. Also found in the bed of the truck were two singular New York State license plates; KKC5246 (voluntarily surrendered: plates destroyed), and AFY3012 (not on file).

53. Concurrent with the surveillance and follow of the Chevrolet pick-up truck, a separate surveillance team followed CAMACHO as he left 1942 West Ridge Road. At about 4:15 PM, CAMACHO drove to a Public Storage facility in the City of Rochester. CAMACHO entered the secured area of the storage facility and drove to an unknown numbered unit on the South portion of the property.¹ CAMACHO exited his truck and took

¹ On or about June 24, 2022, Investigators contacted Public Storage Company. Investigators told representatives of Public Storage Company that CAMACHO was observed going to a storage unit on May 25, 2022. Public Storage Company explained that the storage unit is gated and that an access code is needed to enter the area.

During the timeframe when CAMACHO was observed entering and within the Public Storage facility, the only passcode that was used to enter the facility belonged to an individual named Richard COCILOVA. According to Public Storage Company's records, COCILOVA is renting storage unit C-038. Unit C-038 is located in the exact area where CAMACHO was observed taking property on May 25 and June 24, 2022 (as described below). Records indicate that COCILOVA has the number XXX-XXX-2382 associated with the account.

Records search of COCILOVA show that he has a criminal history including arrests for possession of controlled substance and DWAI under the influence of drugs or alcohol and drugs.

Law enforcement obtained a warrant for the content of CAMACHO's phone records between June 8 and June 14, 2022. The records provided in response to that warrant show that, during that time, CAMACHO's number and COCILOVA's number had multiple text message exchanges in which COCILOVA advised CAMACHO that they need to pay for the storage unit and in June they were behind on payments and owe late fees.

pictures of the items in the bed of his truck (that he had received from Boosters 4, 5, and 6 less than an hour earlier). CAMACHO then placed the items in a storage unit, left the Public Storage facility, and returned to his residence at 641 Hawks Nest Circle.

54. Several of the aforementioned items were posted on the Ton.Camac eBay page shortly after. The postings contained pictures of the items and it appeared that the pictures had been taken in the back of a pick-up truck.

55. For example, at approximately 8:32 PM, Ton.Camac posted an “EGO LM2101 21” Lithium Ion BAT> Powered Push Lawn Mower w. 5.0AH Batter SEALED!” which was listed for \$450.00 (below retail value). According to eBay’s records, the EGO LM2101 was ultimately sold and shipped to a buyer in Massachusetts.

56. Similarly, at approximately 8:18 PM that evening, Ton.Camac posted two “EGO Power+ LB7654 765-CFM 56V Leaf Blower with 5Ah Battery & Charger Kit – New!” for \$249.00 each (below retail value). According to eBay’s records, the two EGO Power+LB7654 leaf blowers were ultimately sold to buyers in Ohio and California.

CONTROLLED PURCHASE 1

57. On or about June 7, 2022, an Undercover Officer (“UCO”) posing as a booster and a Confidential Source (“CS”)² began selling purportedly stolen, new-in-box items to

²The CS has been a cooperating state defendant who has entered a guilty plea in exchange for consideration at sentencing. The CS’s criminal history includes a number of criminal convictions for theft-related offenses as well as narcotic offenses. The information provided by the CS has been corroborated through independent investigation, by information received from other confidential and reliable sources, and by information received independently and separately from other law enforcement agencies. Law enforcement has found no instances

CAMACHO. On or about June 7, 2022, the CS contacted CAMACHO by text message to the phone number of XXX-XXX-4120. CAMACHO instructed the CS to get property he knows that he (CAMACHO) likes. The CS stated that because of the history he has with CAMACHO he knew what items CAMACHO was talking about, meaning copper wire and high-end power tools. CAMACHO told the CS to meet him at 1100 Long Pond Road.

58. That day, law enforcement conducted physical surveillance of CAMACHO's residence at 641 Hawks Nest Circle. Law Enforcement members observed CAMACHO exit 641 Hawks Nest Circle, get into the Toyota Tundra, Temporary PA registration 389815, and drive to 1100 Long Pond Road.

59. The CS and UCO met CAMACHO in the parking lot of 1100 Long Pond Road. The CS and UCO brought CAMACHO products. Each of these items were new and in the box. The total retail value of the products was \$1,533.51. The CS made several overt statements to CAMACHO that the items he/she was selling to CAMACHO were stolen from a retail location. CAMACHO then bought all the products. CAMACHO provided the CS with \$500 (approximately 30% of retail value). CAMACHO placed the products in the back of the Toyota Tundra and eventually left the parking lot of 1100 Long Pond Road. This UCO and CS sale was both audio and video recorded.

where the CS has been found to be untruthful or has attempted to deceive law enforcement relating to the information provided. Therefore, agents have determined the CS to be reliable.

60. After CAMACHO left the location of 1100 Long Pond Road, law enforcement members observed him return to 641 Hawks Nest Circle, remove the property from the Toyota Tundra, and take the items inside of 641 Hawks Nest Circle.

61. On or about July 10, 2022, Ton.Camac listed one of the items that the CS and UCO sold to CAMACHO for sale for \$55.00 (below its retail value). According to eBay's records, the item was sold to a buyer in Georgia. After receiving the item in Georgia, the buyer shipped the item to law enforcement authorities in Rochester, New York, who confirmed that it was in fact the same new-in-box item the CS previously sold to CAMACHO.

CONTROLLED PURCHASE 2

62. On or about June 16, 2022, the CS contacted CAMACHO by text message to phone number XXX-XXX-4120. CAMACHO agreed to meet with the CS and another UCO posing as a booster to sell him property.

63. That day, law enforcement conducted physical surveillance of CAMACHO's residence at 641 Hawks Nest Circle. Law Enforcement members observed CAMACHO drive to 1100 Long Pond Road.

64. The CS and UCO met CAMACHO in the parking lot of 1100 Long Pond Road. The CS and UCO brought CAMACHO products. Each of these items were new-in-box. The total value of the products was \$807.00. During the transaction, the CS made several overt statements to CAMACHO indicating that the items he/she was selling to CAMACHO were stolen from a retail location. CAMACHO bought all the products. CAMACHO paid the CS with \$200 (approximately 25% of their retail value). CAMACHO

placed the products in the back of the Toyota Tundra and eventually left the parking lot of 1100 Long Pond Road. This UCO and CS sale was both audio and video recorded.

65. After CAMACHO left the location of 1100 Long Pond Road, law enforcement members observed him drive to the storage unit located at 605 Lee Road. CAMACHO was observed on recorded video going into and out of a storage unit. After going to the storage unit, CAMACHO drove back to 641 Hawks Nest Circle.

66. Subsequently, on or about July 10, 2022, Ton.Camac listed one of the products that the CS and UCO sold to CAMACHO for sale for \$259.00. The item was purchased and shipped to a buyer in Minnesota. After receiving the item in Minnesota, the buyer shipped it to law enforcement authorities in Rochester, New York, who confirmed that it was in fact the same new-in-box item the CS previously sold to CAMACHO for a fraction of its retail value.

67. Based on surveillance and monitoring and the training and experience of law enforcement officers involved in this investigation, I believe that CAMACHO has no legitimate source of new-in-box merchandise. Thus, all the items posted for sale on the Ton.Camac eBay account as “New” or “Sealed” are stolen goods.


68. Between on or about January 1, 2021 and on or about July 25, 2022, the Ton.Camac eBay account posted 2,332 items for sale and advertised their condition as either “New” or “Sealed.” The items were similar to those that law enforcement had observed boosters bringing to CAMACHO, e.g., wire, high-end tools, electronics, beauty products and Kitchen and home living products. Almost all were priced below their retail value. These eBay sales generated a total of approximately \$469,246.42 in revenue.

CONCLUSION


69. Based upon the forgoing, the undersigned respectfully submits that there is probable cause to believe that CAMACHO knowingly committed the TARGET OFFENSES.

70. Because this investigation is continuing, disclosure of the complaint, application, this affidavit, and/or any attachments thereto will jeopardize the progress of the investigation. Accordingly, the undersigned respectfully requests that the Court issue an order that the search warrant, application, this affidavit, and all attachments thereto be filed under seal until further order of this Court.

Affidavit submitted electronically by email in .pdf format. Oath administered, and contents and signature, attested to me as true and accurate telephonically pursuant to Fed. R. Crim. P. 4.1 and 41(d)(3) on this 5th day of October 2022.



Scott M. Kendall
Special Agent
Homeland Security Investigations



HON. MARK W. PEDERSEN
United States Magistrate Judge